

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

Docket No. 2003-326-C

In Re:)	
)	
Analysis of Continued Availability of)	MOMENTUM BUSINESS
Unbundled Local Switching for Mass)	SOLUTION'S RESPONSES TO
Market Customers Pursuant to the Federal)	BELLSOUTH
Communication Commission's Triennial)	TELECOMMUNICATIONS,
Review Order)	INC'S FIRST REQUESTS FOR
)	PRODUCTION OF
)	DOCUMENT'S

Momentum Business Solutions ("Momentum") pursuant to the Joint Motion for Initial Procedural Order filed by BellSouth and CompSouth on November 12, 2003, and S.C. Code Ann. Regs. 103-851, hereby submits its responses to BellSouth Telecommunications, Inc.'s ("BellSouth's") First Requests for Production of Documents to Momentum Business Solutions.

1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

RESPONSE:

Objection. Momentum objects to the extent the request seeks confidential, proprietary, or privileged documents. Momentum also incorporates by reference any and all objections that Momentum raised in response to BellSouth's First Set of Interrogatories.

2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of South Carolina.

RESPONSE:

Objection. Momentum objects on the grounds that the request seeks discovery of documents that are unrelated to the analysis the South Carolina Public Service

Commission will conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as the FCC ruled that the impairment analysis is not to be based on individual carriers' business models. Momentum also objects on the grounds the request seeks the disclosure of confidential and proprietary business information.

3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you only provide qualifying service.

RESPONSE:

Objection. Momentum objects on the grounds that the request seeks discovery of information already in BellSouth's possession. Momentum also objects on the grounds the request seeks the disclosure of confidential and proprietary business information. Momentum objects on the grounds the request for "all" documents is overbroad and unduly burdensome. Momentum objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in South Carolina to whom you only provide qualifying service.

RESPONSE:

Objection. Momentum objects on the grounds the request seeks the disclosure of confidential and proprietary business information. Momentum objects on the grounds the request for "all" documents is overbroad and unduly burdensome. Momentum objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you only provide non-qualifying service.

RESPONSE:

Objection. Momentum objects on the grounds the request seeks the disclosure of confidential and proprietary business information. Momentum objects on the

grounds the request for “all” documents is overbroad and unduly burdensome. Momentum objects to the use of the terms “qualifying service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations.

6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you provide both qualifying and non-qualifying service.

RESPONSE:

Objection. Momentum objects on the grounds that the request seeks discovery of documents that are unrelated to the analysis the South Carolina Public Service Commission will conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as the FCC ruled that the impairment analysis is not to be based on individual carriers’ business models. Momentum also objects on the grounds the request seeks the disclosure of confidential and proprietary business information. Momentum also objects on the grounds the request seeks the disclosure of confidential and proprietary information. Momentum objects on the grounds the request for “all” documents is overbroad and unduly burdensome. Momentum objects to the use of the terms “qualifying” and “nonqualifying service” on the grounds the terms are subject to differing interpretations.

7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in South Carolina to whom you provide both qualifying and non-qualifying service.

RESPONSE:

Objection. Momentum objects on the grounds the request for “all” documents is overbroad and unduly burdensome.

8. Provide all documents referring or relating to the classifications used by Momentum Business Solutions to offer service to end user customers South Carolina (e.g. residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

RESPONSE:

Objection. Momentum objects on the grounds the request seeks confidential, proprietary, or privileged documents. Momentum also objects on the grounds the request seeks the disclosure of confidential and proprietary business information. Momentum objects on the grounds the request for "all" documents is overbroad and unduly burdensome. Momentum incorporates by reference any and all objections that Momentum raised in response to BellSouth's First Set of Interrogatories.

9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Momentum Business Solutions, as requested in BellSouth's First Set of Interrogatories, No. 34.

RESPONSE:

Objection. Momentum objects on the grounds the request seeks confidential, proprietary, or privileged documents. Momentum also objects on the grounds the request seeks the disclosure of confidential and proprietary business information. Momentum objects on the grounds the request for "all" documents is overbroad and unduly burdensome. Momentum incorporates by reference any and all objections that Momentum raised in response to BellSouth's First Set of Interrogatories.

10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by Momentum Business Solutions, as requested in BellSouth's First Set of Interrogatories, No. 35.

RESPONSE:

Objection. Response: Momentum incorporates its objection to Interrogatory No. 35.

11. Produce all documents referring or relating to how Momentum Business Solutions determines whether to serve an individual customer's location with multiple DS0's or with a DS1 or larger transmission system.

RESPONSE:

Objection. Momentum has no documents responsive to this request, as it does not serve any customer locations with a DS1 or larger transmission system.

12. Produce all documents referring or relating to the typical or average

number of DS0's at which Momentum Business Solutions would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

RESPONSE:

Objection. Momentum has no documents responsive to this request, as it does not serve any customer locations with a DS1 or larger transmission system.

13. Produce all documents referring or relating to the cost of capital used by Momentum Business Solutions in evaluating whether to offer a qualifying service in a particular geographic market.

RESPONSE:

Objection. Momentum objects on the grounds that the request seeks discovery of documents that are unrelated to the analysis the South Carolina Public Service Commission will conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as the FCC ruled that the impairment analysis is not to be based on individual carriers' business models. Momentum also objects on the grounds the request seeks the disclosure of confidential and proprietary business information. Momentum objects on the grounds the request seeks the disclosure of confidential and proprietary business information. Momentum objects on the grounds the request for "all" documents is overbroad and unduly burdensome. Momentum objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations. Momentum objects to the use of the term "cost of capital" on the grounds the term is subject to differing interpretations.

14. Produce all documents referring or relating to the time period used by Momentum Business Solutions in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years, or some other time horizon over which a project is evaluated)?

RESPONSE:

Objection. Momentum objects on the grounds that the request seeks discovery of documents that are unrelated to the analysis the South Carolina Public Service Commission will conduct, irrelevant to the issues in the case, and not reasonably

calculated to lead to the discovery of admissible evidence, inasmuch as the FCC ruled that the impairment analysis is not to be based on individual carriers' business models.

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15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

RESPONSE:

Objection. Momentum objects on the grounds that the request seeks discovery of documents that are unrelated to the analysis the South Carolina Public Service Commission will conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as the FCC ruled that the impairment analysis is not to be based on individual carriers' business models.

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16. Produce all documents referring or relating to your estimate of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

RESPONSE:

Objection. Momentum objects on the grounds that the request seeks discovery of documents that are unrelated to the analysis the South Carolina Public Service Commission will conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as the FCC ruled that the impairment analysis is not to be based on individual carriers' business models.

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17. Produce all documents referring or relating to any complaints by Momentum Business Solutions or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

RESPONSE:

Momentum has no documents responsive to this request.

18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to Momentum Business Solutions or that Momentum Business Solutions believe is superior to BellSouth’s batch hot cut process.

RESPONSE:

Momentum has no documents that are responsive to this request.

19. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to Momentum Business Solutions or that Momentum Business Solutions believes is superior to BellSouth’s individual hot cut process.

RESPONSE:

Momentum has no documents that are responsive to this request.

20. Produce all documents referring or relating to a batch hot cut process used

by any ILEC outside the BellSouth region that is acceptable to Momentum Business Solutions or that Momentum Business Solutions believes is superior to BellSouth's batch hot cut process.

RESPONSE:


Momentum has no documents that are responsive to this request.

21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to Momentum Business Solutions or that Momentum Business Solutions believes is superior to BellSouth's individual hot cut process.

RESPONSE:

Momentum has no documents that are responsive to this request.

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December 17, 2003

CERTIFICATE OF SERVICE

I, the undersigned employee of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for Momentum Business Solutions, do hereby certify that I have a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

Pleadings: **Momentum Business Solution's Responses to BellSouth Telecommunication Inc.'s First Request For Production of Documents**

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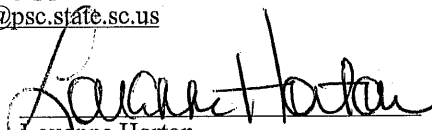
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December 17, 2003